

**REMARKS**

This paper is in response to the Office Action of October 27, 2003. The due date for response extends to January 27, 2004. Claims 1-2, 4-8, 10-14, 16-18, and 20 are pending in this application. Claims 3, 9, 15 and 19 have been canceled. The specification has been amended to correct minor typographical errors. No new matter is presented by way of these amendments.

Claims 1, 2, 4, 7, 8 and 10-14 were rejected under 35 U.S.C. § 102(b) as being anticipated by Jeffries et al. (US 5,974,544). This rejection is respectfully traversed in light of the amendments to claims 1, 7 and 12.

Each of claims 1, 7, and 12 have been amended to include the feature of each read and write command includes a command data block (CDB) and a scatter gather list (SGL), the CDB configured to identify a location of a file on the drive, the SGL being configured to include data pointers identifying a location of data in the memory. As acknowledged by the Examiner, Jeffries does not teach this feature. Accordingly, for at least these reasons independent claims 1, 7, and 12 are not anticipated by Jeffries. Similarly, claims 2 and 4, claims 8 and 10-11, and claims 13 and 14, are dependent from claims 1, 7, and 12, respectively. For at least the above stated reasons, claims 2 and 4, claims 8 and 10-11, and claims 13 and 14, are not anticipated by Jeffries.

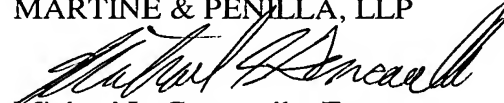
Furthermore, amended claims 1, 7, 12, and 17 are patentable over the combination of Jeffries in view of U.S. Patent No. 5,974,544 to Chisholm as the combination of references does not include each and every feature of amended claims 1, 7, 12, and 17. According to the Examiner, Chisholm discloses the feature of a command data block (CDB) configured to identify a location of a file on the storage medium. Applicants respectfully disagree with this

characterization of Chisholm. Chisholm includes data channel control block (DCB) images for each data channel. The DCB images have a structure defining a starting address of a scatter/gather list and a count of subsequent scatter gather elements (See column 7, lines 55-63). Thus, the DCB images are associated with the scatter/gather list in that the DCB images provide a starting address of the scatter/gather list. In contrast, the command data blocks (CDB) of the present invention includes a location of the file on the disk, a count of sectors, and command information, while the scatter gather list is associated with the location of data within the random access memory (RAM) and byte count information for a command (See page 9, lines 23-26). Thus, the SGL is associated with the data location in RAM while the CDB is associated with the data location on the storage medium. Through the combination of the two, (SGL and CDB) the movement of the data between the RAM and the storage medium is accomplished, as the location within the RAM and the storage medium may be ascertained through the SGL and CDB, respectively. Thus, in the present invention the CDB and the SGL refer to data in different locations and not each other, as in Chisholm. Additionally, the DCB images of Chisholm have nothing to do with determining a type of command, i.e., a read or write, as amended claims 1, 7, 12, and 17. For at least the same reasons, the dependent claims from claims 1, 7, 12, and 17 are patentable over the combination of Jeffries in view of Chisholm.

In view of the foregoing, Applicants respectfully submit that all of the pending claims are in condition for allowance. A notice of allowance is respectfully requested. In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (408) 749-6900 x6921. If any fees are due in connection with

the filing of this paper, then the Commissioner is authorized to charge such fees to Deposit Account No. 50-0805 (Order No. ADAPP206). A copy of the transmittal is enclosed for this purpose.

Respectfully submitted,  
MARTINE & PENELLA, LLP



Michael L. Gencarella, Esq.  
Reg. No. 44,703

710 Lakeway Drive, Suite 170  
Sunnyvale, CA 94085  
Telephone: (408) 749-6900